

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Cleta Mitchell, Esq.
Foley & Lardner LLP
Washington Harbour
3000 K Street, NW, Suite 500
Washington, DC 20007-5143

DEC 1 2006

RE: MUR 5496

Huffman for Congress and David Blanton, in his
official capacity as treasurer; Lawrence David
Huffman; Dean Proctor

Dear Ms. Mitchell:

On May 5, 2005, the Federal Election Commission (the "Commission") found reason to believe that Lawrence David Huffman and Dean Proctor knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended; that Lawrence David Huffman violated 2 U.S.C. § 441b; and that Huffman for Congress and David Blanton, in his official capacity as treasurer, violated 2 U.S.C. §§ 434(b), 441a(f), 441b and 441f. On November 2, 2006, the Commission voted to take no further action with respect to the violations of 2 U.S.C. § 441b. [REDACTED]

Pre-probable cause conciliation is not mandated by the Act or the Commission's regulations, but is a voluntary step in the enforcement process that the Commission is offering to your clients as a way to resolve this matter at an early stage and without the need for briefing the issue of whether or not the Commission should find probable cause to believe that your clients violated the law.


[REDACTED]

If your clients are interested in engaging in pre-probable cause conciliation, please contact me within seven days of receipt of this letter. During conciliation, you may submit any factual or legal materials that you believe are relevant to the resolution of this matter. Because the Commission only enters into pre-probable cause conciliation in matters that it believes have a reasonable opportunity for settlement, we may proceed to the next step in the enforcement process if a mutually acceptable conciliation agreement cannot be reached within sixty days. See 2 U.S.C. § 437g(a); 11 C.F.R. Part 111 (Subpart A). Please note that once the Commission enters the next step in the enforcement process, it may decline to engage in further settlement discussions until after making a probable cause finding. [REDACTED]

[REDACTED]

If you have any questions or suggestions for changes in the agreements, or if you wish to arrange a meeting in connection with mutually satisfactory conciliation agreements, please contact me at (202) 694-1650.

Sincerely,



Ana Peña-Wallace
Attorney

[REDACTED]

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